



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 8, MONTANA OFFICE  
FEDERAL BUILDING, 10 West 15<sup>th</sup> St, Suite 3200  
HELENA, MONTANA 59626

Ref: 8MO

May 22, 2008

Chuck Oliver, District Ranger  
Darby Ranger District  
172 N. Main  
Darby, Montana 59829

Re: CEQ # 20080147; EPA Comments on  
Trapper Bunkhouse Land Stewardship  
Project FEIS & ROD

Dear Mr. Oliver:

The Environmental Protection Agency (EPA) Region VIII Montana Office has reviewed the Final Environmental Impact Statement (FEIS) and Record of Decision for the Bitterroot National Forest's Trapper Bunkhouse Land Stewardship Project in accordance with its responsibilities under Section 102(2)(C) the National Environmental Policy Act (NEPA), and Section 309 of the Clean Air Act.

The EPA appreciates receipt of responses to agency and public comments and concerns identified during review of the DEIS. The new preferred alternative (Alternative 4) presented in the FEIS and ROD includes the vegetative treatments from both other action alternatives, and thus, involves a greater level of vegetation treatments (5,827 acres) and temporary road construction (2.8 miles) than either of the action alternatives evaluated in the DEIS. While the EPA remains supportive of the proposed Trapper Bunkhouse Land Stewardship Project purpose and need to reduce risk from fires, improve vegetation resiliency to insects and disease, provide economic value of timber, conduct fuel reduction research, and particularly to improve watersheds in the project area, we are concerned that inadequate budgets for conduct of needed road maintenance and decommissioning work appear to require additional commercial timber harvest to obtain revenue to implement needed road/watershed improvement work (Alternative 4 includes 539 acres of more commercial timber harvest than Alternative 3).

We do not oppose vegetation management and harvest of timber, but we are concerned about the long-term implications of a budget process that provides inadequate funding for management of the National Forest road system, forcing increased use of commercial timber harvests to obtain revenue to maintain roads and decommission unneeded roads, and protect streams from road water quality impacts. As you know, sediment from roads, particularly poorly maintained roads with inadequate road drainage is a major cause of adverse water quality

impacts within forests. Roads are stated to be the greatest sediment source within the Trapper Bunkhouse area. We support implementation of all the proposed road maintenance and improvement activities in the EIS (i.e., blading, shaping and improving 6 cross-drains on 3 mile of FR 374 near Little Trapper Creek, and grading, graveling, and installing dips on 1.5 miles of FR 374 near South Fork Chaffin Creek, and other culvert replacements and 7.6 miles of road decommissioning with road stream crossing removals).

The FEIS indicates that road sediment effects from all 3 action alternatives would be similar for Little Trapper Creek and South Fork Chaffin Creek, but would be higher in the lower mainstem of Chaffin Creek due to additional log haul trips with the preferred alternative. The estimated number of log trucks trips along the main segment of Chaffin Creek is projected to increase by 55%. We are pleased that additional mitigation is proposed on FR716/FR374 with magnesium chloride road treatments to reduce sediment transport from roads to streams with the preferred alternative, but we are concerned about the ability to carry out continuing road maintenance and treatments that may be needed over the ten year project period and thereafter given inadequate road maintenance budgets. Will it be necessary to plan and conduct additional commercial timber harvest (i.e., beyond that disclosed in the FEIS), to obtain revenues for continuing road maintenance over the long-term?

Also, we want to again state our preference for effective enforcement of rules against cutting firewood in riparian areas rather than conduct of pre-emptive logging of trees from riparian areas to remove the incentive for firewood cutters. We are concerned that such riparian logging may set a precedent, and potentially promote logging of other riparian areas and/or sensitive areas that may be accessible to firewood cutters. Although we understand the Forest Service perspective that the agency lacks adequate funding for effective enforcement of rules prohibiting firewood cutting in riparian areas, and believes pre-emptive logging of 20 acres of the Little Trapper Creek riparian area will result in a better outcome relative to riparian and water quality impacts, and we respect the perspective of local land managers. We appreciate the fact that a fisheries biologist or hydrologist will work with the Timber Sale Administrator to provide oversight of the Little Trapper Creek riparian harvest to minimize adverse effects.

The EPA appreciates the opportunity to review and comment during the EIS process, and the opportunity to review the proposed project in the field. If you have any questions please contact Mr. Steve Potts of my staff in Helena at 406-457-5022 or in Missoula at 406-329-3313 or via e-mail at [potts.stephen@epa.gov](mailto:potts.stephen@epa.gov) . Thank you for your consideration.

Sincerely,

/s/

John F. Wardell  
Director  
Montana Office

cc: Larry Svoboda/Julia Johnson, EPA 8EPR-N, Denver  
Robert Ray/Mark Kelley, MDEQ, Helena